From: Casso, Ruben [Casso.Ruben@epa.gov]

Sent: 10/25/2021 7:34:21 PM

To: Verhalen, Frances [verhalen.frances@epa.gov]

CC: Riddick, Nia [Riddick.Nia@epa.gov]

Subject: RE: R6 EtO Outreach: input is welcomed

Attachments: DRAFT R6 Sterlizer update info 10-21-21.docx

Since it's for Garcia, I took a more talking point, full sentence approach. See what you think. It's basically the same information you had with a few minor tweaks. Edit as needed.

Outreach Timing:

In general, R6 would prefer to conduct outreach later rather than sooner to make sure the public is getting current and not outdated information. Our three highest risk facilities with currently estimated risks greater than 2,000 in a million, which we would guess should be done first, are based on emissions data from as far back 2011 to only as recent as 2014. We believe the data from the ICR response and an updated risk assessment from that new data would give the Agency and the community a more current picture of estimated risks from these three R6 EtO sterilization facilities.

(b)(5)

The ICR response in November should provide details on this addition of EtO emission controls which an updated risk assessment should address.

Outreach sequence or priority order:

As stated above, we believe the sequence and priority order for R6 commercial sterilizer outreach should be governed based on updated risk assessments using new data from the ICR response due November 19, 2021.



For the remainder of the R6vsterilizer outreach efforts:

- Followed by sterilizers with risk 1,000 in 1,000,000 risk or greater (Steris Isomedix in El Paso, TX; NovoSci in Conroe, TX; Steritec in Athens, TX)
- Followed by sterilizers with risk greater than 100 but less than 1,000 in 1,000,000 risk (Sterigenics in Grand Prairie; LEMCO in Ardmore, OK)
- R6 may group the two sterilizer facilities in Grand Prairie, TX and El Paso, TX as they are the same community and physically close to each other;
- R6 does not plan to conduct outreach at facilities listed as at, but not above, an estimated 100 in a million risk (i.e. Sterigenics in Santa Teresa, NM)

We expect to conduct virtual community meetings, though these may be in-person meetings, depending on status of pandemic risks.



• State and/or Industry involvement:

We would like some time built into our outreach schedule to brief the affected states and the facilities on our outreach plans in advance. Our current thoughts and plans are as follows:

- Currently, have indicated to TX and OK that there will likely be outreach on EtO Sterilizers in their states in the upcoming months; general discussion only
- Will inquire if States want to participate in meeting
- Have not reached out industry
- Do not expect to have industry participate in meeting

Coordination with other federal agencies (ie. HUD)

To date, R6 has not done any specific outreach with other Federal agencies. All such coordination has been done at the HQ level. R6 has no plans for outreach to other Federal agencies at this time.

Specific ideas to present (community risk maps highlighting risk values):



From: Verhalen, Frances <verhalen.frances@epa.gov>

Sent: Monday, October 25, 2021 2:09 PM

To: Casso, Ruben <Casso.Ruben@epa.gov>; Riddick, Nia <Riddick.Nia@epa.gov>

Subject: FW: R6 EtO Outreach: input is welcomed

Ruben, here is my first draft. I recommend we attach your document sent to Koerber/Vasu to the email to DGarcia.

As we prepare for the EtO Public Meetings addressing community risk values near commercial sterilizers. R6 prefers the following:

Outreach Timing:

- Community meetings to be scheduled after risk has been re-evaluated based on recent information collection request (ICR) in support of Risk and Technology Review for the Commercial Ethylene Oxide (EtO) Sterilizer rule
 - Emissions data for 3 facilities is 10 or more years old; ICR should provide updated emissions which will likely impact risk
 - Congressional/community interest in EtO emissions from Midwest Sterilization in Laredo, TX;
 this facility also on OIG list of 25 facilities from March 2020
- Community meetings to focus primarily on risks from EtO, alternatives for sterilization techniques or chemicals, rules revisions
- Outreach sequence or priority order:
 - Expect virtual community meetings, though these may be in-person meetings, depending on status of pandemic risks

- May start with Midwest Sterilization in Laredo; congressional/community interest; on OIG list of 25 facilities and scheduled with Sterilizer rules update
- Followed by sterilizers with risk 1,000 in 1,000,000 risk or greater (Steris Isomedix in El Paso, TX; NovoSci in Conroe, TX; Steritec in Athens, TX)
- Followed by sterilizers with risk greater than 100 but less than 1,000 in 1,000,000 risk (Sterigenics in Grand Prairie; LEMCO in Ardmore, OK)
- May group facilities in Grand Prairie, TX, as they are the same community; will evaluate El Paso, TX/St.
 Teresa, NM facilities as they are close but may not be the same communities
- Recommend different outreach individual-centric format for Ardmore, OK where by it appears <u>5</u>
 residences are impacted
- State and/or Industry involvement:
 - Currently, have indicated to TX, NM, and OK that there will likely be outreach on EtO Sterilizers in their states in the upcoming months; general discussion only
 - Will inquire if States want to participate in meeting
 - Have not reached out industry
 - Do not expect to have industry participate in meeting
- Coordination with other federal agencies (ie. HUD)
 - Have not reached out to other federal agencies in R6 at this time
- Specific ideas to present (community risk maps highlighting risk values):

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From: Robinson, Jeffrey < Robinson, Jeffrey@epa.gov>

Sent: Monday, October 25, 2021 10:40 AM

To: Verhalen, Frances < <u>verhalen.frances@epa.gov</u>> **Subject:** FW: R6 EtO Outreach: input is welcomed

From: Garcia, David < Garcia.David@epa.gov > Sent: Friday, October 22, 2021 11:36 AM

To: Robinson, Jeffrey < Robinson.Jeffrey@epa.gov >; Verhalen, Frances < verhalen.frances@epa.gov >

Cc: Ngo, Kim < Ngo.Kim@epa.gov>

Subject: R6 EtO Outreach: input is welcomed

Jeff/Fran,

In preparation for the Acting DRA conversation with other DRAs and Janet McCabe on EtO outreach. Pls prepare a suggested/proposed talking points to the topics below. Pls forward information to Kim and I by Tuesday noon or sooner. As we prepare for the EtO Public Meetings addressing community risk values near commercial sterilizers. R6 prefers the following:

- Outreach Timing:
- Outreach sequence or priority order:
- State and/or Industry involvement:
- Coordination with other federal agencies (ie. HUD)
- Specific ideas to present (community risk maps highlighting risk values):

David F Garcia, Director Air and Radiation Division 1201 Elm St, Dallas, Texas 75270 Office 214 665 7593